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24 GOOGLE LLC
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26 HYPERMEDIA NAVIGATION LLC,
27 v.
28 GOOGLE LLC,
Defendant.
29

30 Case No. 4:18-cv-06137-HSG

31 **STIPULATION AND ORDER TO**
EXTEND DEADLINES FOR
DEFENDANT'S INVALIDITY
CONTENTIONS AND
ACCOMPANYING DOCUMENT
PRODUCTION UNDER PATENT
LOCAL RULES 3-3 AND 3-4

32 Under the Court's Scheduling Order (ECF No. 42), Defendant Google LLC ("Defendant")
33 must serve its Invalidity Contentions and Accompanying Document Production pursuant to Patent
34 L.R. 3-3 and 3-4 ("Defendant's Contentions") on or before April 18, 2019.
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36 STIPULATION AND ORDER TO EXTEND
37 DEADLINES
38 NO. 4:18-CV-06137-HSG

1 Pursuant to Civil L.R. 6-2 and 7-12, the parties have agreed to a two-week extension of the
2 deadline for Defendant's Contentions, such that Defendant must serve the Contentions on or before
3 **May 2, 2019.**

4 The parties make this request for extension because Plaintiff intends to supplement its
5 Patent L.R. 3-1 and 3-2 disclosures by February 28, 2019, four weeks after serving those disclosures
6 on January 30, 2019. The parties agree that Defendant should be allowed an additional two weeks
7 to serve its Patent L.R. 3-3 and 3-4 disclosures in response to Plaintiff's supplementations.

8 There have been no previous requests for extensions with respect to the deadlines for
9 Defendant's Contentions and the requested two-week extension of this deadline would not alter the
10 schedule for the rest of the case or any additional deadlines in the case schedule.

11 The parties therefore respectfully request that the Court modify the schedule to change the
12 deadline for Defendant's Patent L.R. 3-3 and 3-4 disclosures to May 2, 2019.

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2 Dated: February 28, 2019

Respectfully submitted,
NI, WANG & MASSAND, PLLC

4 By: /s/ Hao Ni
5 Hao Ni

6 Attorney for Plaintiff
7 HYPERMEDIA NAVIGATION LLC

8 Dated: February 28, 2019

O'MELVENY & MYERS LLP

9
10 /s/ Mark Liang
11 Mark Liang

12 Attorneys for Defendant
13 GOOGLE LLC

14 **FILER'S ATTESTATION**

15 Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Mark Liang, attest that
16 concurrence in the filing of this document has been obtained.

17 Dated: February 28, 2019

/s/ Mark Liang
18 Mark Liang

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: February 28, 2019

Haywood S. Gill Jr.
The Honorable Haywood S. Gilliam, Jr.
United States District Judge